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Federal Communications Commission
Office of the Secretary

**Comments of CTIA on
Draft Guidance for Performing T-Coil Tests for Air Interfaces Supporting VoIP (e.g. LTE
and Wi-Fi) to support CMRS based Telephone Services,
OET Laboratory Division Report, No. 285076**

CTIA–The Wireless Association® (“CTIA”) hereby comments on the draft guidance provided on July 17, 2013 by the Office of Engineering and Technology (“OET”) for Hearing Aid Compatibility (“HAC”) testing of inductive coupling (*i.e.* telecoil mode or T-ratings) for wireless handsets operating on Long Term Evolution (“LTE”) and Wi-Fi air interfaces and used to support Voice over Internet Protocol (“VoIP”). *See Guidance for Performing T-Coil tests for Air Interfaces Supporting Voice over IP (e.g. LTE and Wi-Fi) to support CMRS based Telephone Services*, Draft Laboratory Division Publications Report, No. 285076 (rel. Jul. 17, 2013), <https://apps.fcc.gov/eas/comments/GetPublishedDocument.html?id=339&tn=596089> (“*Draft Guidance*”).

The *Draft Guidance* is an important step in the Commission’s transitional process for moving to the 2011 ANSI C63.19 standard (“2011 ANSI Standard”) as the basis for HAC testing. OET is to be applauded for its efforts. OET and the Wireless Telecommunications Bureau (“WTB”) took important steps in 2012 to extend the usefulness of the Commission’s HAC regime by adopting the 2011 ANSI standard and a transitional plan for implementing its use. *See Amendment of the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets*, 27 FCC Rcd 3732 (OET, WTB 2012) (“*2011 ANSI Standard Order*”).

CTIA supports immediate adoption of the *Draft Guidance* with the revisions suggested by the Telecommunications Industry Association (“TIA”). CTIA believes that TIA’s suggestions, which are not extensive, will provide more certainty to manufacturers and the telecommunications certification bodies (“TCBs”) that will perform the testing using the *Draft Guidance*. As so modified, the *Draft Guidance* will enable industry and TCBs to proceed with testing under the 2011 ANSI Standard efficiently and with a minimum of confusion.

In particular, CTIA supports the intent of Part 4.0 of the *Draft Guidance*, which permits applicants that are testing pursuant to the 2011 ANSI Standard to “continue to exclude tests for VoLTE or VoIP over Wi-Fi for CMRS air interfaces with an attestation or declaration in the test report stating that instrumentation for testing VoLTE was not available for T-coil testing at the time testing was done and when they expect to have operational test instrumentation.” *Draft Guidance* at 4. This guidance recognizes that test instrumentation for VoLTE or VoIP over Wi-Fi is not now available.

CTIA wishes to note the possibility of a further transitional issue. When new test instrumentation for VoLTE or VoIP over Wi-Fi becomes available, CTIA anticipates that a variety of mobile devices readily will receive acceptable T-ratings for VoLTE or Wi-Fi. However, if there are difficulties with obtaining the test instrumentation or the test protocols, it is possible that industry might have to request a brief extension of time or similar relief to complete the transitional process established in the *2011 ANSI Standard Order*, so that sufficient numbers of compliant handsets are available to service providers to permit them to select the appropriate mix of devices to satisfy the Commission’s HAC benchmark rules. CTIA and its members will be monitoring the progress of testing as new instrumentation is introduced.

CTIA supports immediate adoption of the *Draft Guidance* with the modifications suggested by TIA. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

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